

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

DOUGLAS PIERSON,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

Civil Action No. 2:17-cv-02739-TJS

**PLAINTIFF'S MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE***

Plaintiff Douglas Pierson, by counsel, applies for the admission of Brewster S. Rawls of the Virginia law firm of RawlsMcNelis, P.C., as counsel for Plaintiff in this action, and in support of this motion states as follows:

1. Brewster S. Rawls is a member in good standing of the Virginia State Bar.
2. The law office of RawlsMcNelis, P.C. is located at 211 Rocketts Way, Suite 100, Richmond, VA 23231.
3. Brewster S. Rawls is admitted to practice before all courts of the Commonwealth of Virginia, the Fourth Circuit Court of Appeals, and the Eastern and Western Districts of Virginia.
4. Brewster S. Rawls is in good standing in all of the Bars in which he is a member and has not been disbarred or censured by any court or by any state bar association.
5. There are no pending disciplinary proceedings against Brewster S. Rawls.
6. Attached is the verified application of Brewster S. Rawls, which is submitted in support of this motion.

7. Further, pursuant to the Court Policies and Procedures regarding *Pro Hac Vice* Motions, Brewster S. Rawls provides the additional required information below:

**ATTORNEY ADMISSIONS**

<u>Virginia</u> (State where admitted)	<u>05/08/1984</u> (Admission date)	<u>23604</u> (Attorney Bar No.)
<u>Western District Virginia</u> (State where admitted)	<u>06/18/1984</u> (Admission date)	<u>23604</u> (Attorney Bar No.)
<u>Eastern District of Virginia</u> (State where admitted)	<u>03/20/1987</u> (Admission date)	<u>23604</u> (Attorney Bar No.)
<u>4th Circuit Court of Appeals</u> (Court where admitted)	<u>06/18/1984</u> (Admission date)	<u>23604</u> (Attorney Bar No.)

**WHY THE PARTY DESIRES THE ATTORNEY TO PARTICIPATE AND WHY THE ATTORNEY IS ESPECIALLY QUALIFIED TO DO SO**

This medical malpractice suit arises under the Federal Tort Claims Act because it involves medical care provided to Mr. Pierson at the Philadelphia VA Medical Center. Mr. Rawls has represented Mr. Pierson throughout the course of this matter, beginning with the filing of the administrative tort claim with the Department of Veterans Affairs. Because a resolution of the administrative claim could not be reached with the VA, Mr. Pierson has authorized Mr. Rawls to file this lawsuit on his behalf.

Mr. Rawls has extensive experience in medical malpractice litigation and represents veterans and their family members in medical malpractice litigation all around the country. Mr. Rawls has retained Richard L. Frankel of Bross & Frankel, P.A. to serve as local counsel in this case, but the case will primarily be prepared for trial and tried by Mr. Rawls.

Dated this 29<sup>th</sup> day of June, 2017.

Respectfully submitted,

DOUGLAS PIERSON

By: s/Richard L. Frankel  
Richard L. Frankel  
Bross & Frankel, P.A.  
102 Browning Lane, Bldg. C-1  
Cherry Hill, NJ 08003  
(856) 795-8880  
(856) 795-1242 – Facsimile  
rich@brossfrankel.com  
Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I certify that on June 29, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which will send notice of such filing to the following registered CM/ECF Users:

Joel Sweet, Esq.  
Assistant United States Attorney  
Eastern District of Pennsylvania  
615 Chestnut St., Ste. 1250  
Philadelphia, PA 19106

By: s/Richard L. Frankel  
Richard L. Frankel  
Bross & Frankel, P.A.  
102 Browning Lane, Bldg. C-1  
Cherry Hill, NJ 08003  
(856) 795-8880  
(856) 795-1242 – Facsimile  
rich@brossfrankel.com  
Counsel for Plaintiffs